

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CLERK'S OFFICE
AT BALTIMORE

Approved.

ELH

USOJ

6/16/16

SHARON BOST, in her individual capacity
and as Personal Representative of the
ESTATE OF FATIMA NEAL,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC., *et*
al.,

Defendants.

Case No. 1:15-cv-03278-ELH

Hon. Ellen L Hollander,
District Judge

JURY TRIAL DEMANDED

* * * * *

JOINT MOTION REGARDING DISCOVERY SCHEDULE

Plaintiff SHARON BOST, in her personal capacity and as Personal Representative of the ESTATE OF FATIMA NEAL, by her attorneys, Defendants WEXFORD HEALTH SOURCES, INC., ANIKE AJAYI, ELIZABETH OBADINA, EBRE OHANEJE, NAJMA JAMAL, KAREN MCNULTY, ANDREA WIGGINS, GETACHEW AFRE, JOCELYN EL-SAYED, OBBY ATTA, by their attorneys, and Defendants BALTIMORE CITY DETENTION CENTER, SHAVELLA MILES, CAROL MCKNIGHT, VALERIE ALVES, GWENDOLYN OLIVER, RICKEY FOXWELL, CAROL HARMON, by their attorneys,¹ respectfully submit this joint motion to alter the Rule 26(a)(2) disclosure deadlines in this case:

1. On April 19, 2016, the Court entered a scheduling order in this matter. *See* Doc. No. 44. The scheduling order provides that the parties may request modifications to the scheduling by May 19, 2016, and thereafter may request modifications only for good cause. *Id.*

¹ Defendants Cierra Ladson and Carolyn Atkins are not represented by the Office of the Attorney General, they have not yet appeared to defend this case, and they have not been consulted on the filing on this motion.